

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

FEIN, SUCH, KAHN & SHEPARD, P.C.

Counsellors at Law
7 Century Drive - Suite 201
Parsippany, New Jersey 07054
(973) 538-9300
Attorneys for Movant
Select Portfolio Servicing,
Inc., as servicer for CSMC
2020-RPL2 Trust
JILL A. MANZO, ESQ.
SPS2549
bankruptcy@fskslaw.com

In Re:

HENRY BELL JR

Debtor(s).

Case No.: 22-15432 RG

Adv. No.: N/A

Chapter: 13

Hearing Date: February 15, 2023

Judge: Honorable Rosemary Gambardella

**NOTICE OF MOTION TO VACATE
AUTOMATIC STAY PURSUANT TO 11
U.S.C. 362 (d)**

PLEASE TAKE NOTICE that the undersigned attorney for the Movant, Select Portfolio Servicing, Inc., as servicer for CSMC 2020-RPL2 Trust, shall move before the United States Bankruptcy Judge, Honorable Rosemary Gambardella, 50 Walnut Street, Newark NJ 07102 on **February 15, 2023 at 10 a.m.**, or as soon thereafter as counsel may be heard, for the following relief:

A. For an Order to Vacate the Automatic Stay pursuant to 11 U.S.C. 362 (d) (1) and/or (2) to permit Select Portfolio Servicing, Inc., as servicer for CSMC 2020-RPL2 Trust, to proceed against the

Debtor(s) and to foreclose upon residential real property of the Debtor(s) known as 299 Ege Ave, Jersey City, NJ 07304 (hereinafter "Premises"), by any lawful means in the Superior Court of New Jersey, Chancery Division; and

B. For such other relief as is just.

STATEMENT OF NON-NECESSITY OF BRIEF: The Movant certifies pursuant to D.N.J. LBR 9013-2 that the within motion involves common questions of law and fact and does not involve complex or novel issues such as to require the submission of a legal brief.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, counsel will rely upon the Certification of Select Portfolio Servicing, Inc., as servicer for CSMC 2020-RPL2 Trust.

Dated: December 28, 2022

FEIN, SUCH, KAHN & SHEPARD,
P.C., Attorneys for Movant
Select Portfolio Servicing,
Inc., as servicer for CSMC
2020-RPL2 Trust
X /S/ JILL A. MANZO